

OCT 28 2002

Before the
Federal Communications Commission
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)	
)	
2002 Biennial Regulatory Review – Review of the)	MB Docket No. 02-277
Commissions' Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MM Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning Multiple)	MM Docket No. 01-317
Ownership of Radio Broadcast Stations)	
in Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244

REQUEST FOR EXTENSION OF TIME

The Network Affiliated Stations Alliance (NASA), which consists of the associations representing stations affiliated with (but not owned by) the ABC, CBS and NBC television networks, here requests an extension of the filing deadlines established in the FCC's September 23, 2002, Notice of Proposed Rule Making ("Ownership Notice") in the above captioned proceeding. NASA intends to comment on the national rules at issue here, most specifically the 35% cap rule. NASA requests an extension until February 3, 2003, for initial comments and March 3, 2003, for reply comments.

On October 29, 2001, the Commission held a roundtable discussion regarding its media ownership policies and announced the establishment of its Media Ownership Working Group. The Working Group, which was charged with examining the Commission's regulation of media ownership based on the core goals of localism, diversity and competition, then commissioned 12 economic studies that were intended to be put out for public comment and to

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inform the Commission's decision-making in this proceeding. Because of the role of these studies (themselves 800 pages in length), the Ownership Notice (which itself is 55 pages long) wisely provided that the deadline for initial comments should be keyed off the date on which the studies were released; specifically, the Commission determined that the deadline would fall 60 days after the release of the studies. The studies were released on October 1, 2002, and hence the initial and reply comment deadlines were set for December 2, 2002 and January 2, 2003.

Both the Ownership Notice and the relevant court decisions stress the importance of studies and empirical data, with the Ownership Notice requesting empirical data on at least twelve different occasions. NASA intends to respond to this general desire for empirical data in connection with the national rules, though it cannot realistically hope to develop it on all points where the FCC has expressed an interest in more data. To assist in commenting on the Ownership Notice, NASA has engaged economists to examine the relevant issues. It also is undertaking to develop certain relevant empirical data. It was 11 months from the time the FCC established its Working Group until it released the studies that that group commissioned. Compared with that timing, it seems reasonable to provide four months for other parties to prepare their studies and submit comments based on those studies.


NASA regrets that its request for extension of time may delay resolution of issues involving local ownership rules, where some of the proceedings have been ongoing for a year or more and a record already has been developed. **NASA** believes that the national rules involve different issues than the local rules. It understands that the FCC wishes to gather all the data at *one* time and in one proceeding, but there are several ways in which the FCC can *follow through* on this desire without feeling it must issue a decision on all of these rules at the same time. There are ways that the Commission could avoid the slowest item in the package of rules from

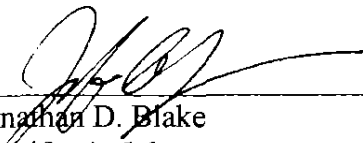
becoming the pacing item for resolving all of the rules at issue in this proceeding. Such steps could mitigate the delay potentially caused by NASA's extension request with respect to the local ownership rules.

However the Commission deals with the above concern, **NASA** submits that a two-month extension request is both fair and necessary, and it asks that the Commission act favorably on it.

Respectfully submitted,

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